

**UNITED STATES DISTRICT COURT FOR THE
DISTRICT OF MASSACHUSETTS**

MARIA ALEJANDRA CELIMEN SAVINO,
et al.,

Petitioners-Plaintiffs,

v.

STEVEN SOUZA,

Respondent-Defendant.

Case No. 1:20-cv-10617-WGY

DECLARATION OF ANGELA DE JESUS CONCEPCION

1. My name is Angela Jesus de Concepcion and I am currently detained in Bristol County, Unit E-B. I have been detained here since on or about April 8, 2019.
2. As of now, there are five of us women being held in immigration detention in this Unit, but we are held with state inmates. We share common spaces, including the day area, the TV room, and the bathrooms.
3. At mealtimes, a detainee hands out the food from a cart with trays on it. We line up to get food.
4. There is a small room that contains the law library, a TV, and a sink. It is hard to maintain space in this room because the area is very small. If I'm trying to look at legal research, for example, another person would not be able to watch TV. Only two people could safely be six feet apart in this room, but there are more than two people in this room regularly.
5. Additionally, there are three showers and four toilet stalls, which we share with the state inmates. Sometimes, the soap runs out and it takes 1-2 days to replace.
6. The detainees are responsible for cleaning the unit every day.
7. I do not think that the staff here are testing people. I have never been tested for COVID-19 and I know that one individual, Altagracia Baez, was brought in on March 29, 2020. I don't believe she was tested when she first arrived, but she later fell sick and was taken to the medical unit.

8. We were recently given masks, but they are hard to breathe in.
9. We were informed that four staff members have tested positive for COVID-19 and that they will return to their duties after they recover. We don't know if these people may spread the virus in here when they come back.
10. We are staying in a closed unit and I am afraid for my life. I don't want to die in here and I'm sitting in fear every day. I'm especially scared because we are mixed with the state inmates.
11. This declaration was read to me in English, and I swear it is true. I have authorized Megan Yan, law student intern working on *Savino v. Souza*, to sign for me.

Dated: April 15, 2020

/s/ Angela de Jesus Concepcion
Angela de Jesus Concepcion